

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

John Doe,)	
)	
Plaintiff,)	
)	
V.)	1:15-CV-4354-RWS
)	
The Board of Regents for the)	
University System of Georgia,)	
G.P. "Bud" Peterson,)	
John Stein, and Peter)	
Paquette, in their individual and)	
official capacities and Reta)	
Pekowsky as agent of the Georgia)	
Institute of Technology))	
)	
Defendants.)	

**DEFENDANTS' MOTION FOR EXTENSION OF TIME TO FILE THEIR
RESPONSE BRIEF TO THE MOTION FOR PRELIMINARY
INJUNCTION AND MOTION TO DISMISS**

COME NOW Defendants, by and through counsel, the Attorney General for the State of Georgia, and hereby move this Court for an order allowing them a brief extension to respond to Plaintiff's Motion for Preliminary Injunction and their Motion to Dismiss:

1.

Plaintiff's complaint involves multiple counts and Defendants.

2.

The factual allegations and responses for the various Defendants and issues are somewhat involved (Plaintiff's complaint is 102 pages and 339 paragraphs).

3.

Plaintiff served this complaint on December 17, 2015 against the Board of Regents and several staff and faculty at the Georgia Institute of Technology.

4.

As service occurred one day prior to the University's closure for the holiday break, it's been difficult to obtain records and to effectively meet with clients to prepare a response.

5.

Defendants' response to the motion for preliminary injunction is currently due on December 31, 2015 and their Answer or Motion to Dismiss is Due on January 7, 2016.

6.

The Court has set a hearing for January 7, 2016 at 11:30 a.m.

7.

Defendants request that they be provided a brief extension to January 4, 2016 to file their Response brief to the Motion for Preliminary Injunction and January 9, 2015 to prepare their answer or Motion to Dismiss.

8.

Plaintiff will not be prejudiced by these delays.

Respectfully submitted this 29th day of December, 2015.

SAMUEL S. OLENS 551540
Attorney General

KATHLEEN M. PACIOUS 558555
Deputy Attorney General

s/DEVON ORLAND
Georgia Bar No. 554301
Senior Assistant Attorney General

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CERTIFICATE PURSUANT TO L.R. 7.1D

I hereby certify that this motion and brief conform to the requirements of L.R. 5.1C. This brief is written in 14 point New Times Roman font.

/s/Devon Orland
DEVON ORLAND

CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed **MOTION FOR EXTENSION OF TIME TO RESPONSE TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION AND TO FILE THEIR ANSWER OR MOTION TO DISMISS** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to Plaintiff's attorneys of record:

Jonathon Hawkins
Christopher Adams

This 29th day of December, 2015.

/s/Devon Orland
DEVON ORLAND 554301